

# CENTENNIAL COMMUNICATIONS

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November 17, 2006

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Centennial Communications Corp.  
Hearing Aid Compatibility Compliance Report – WT Docket 01-309**

Dear Ms. Dortch:

Pursuant to the Commission's Hearing Aid Compatibility Report and Order in WT Docket No. 01-309,<sup>1</sup> and the subsequent Public Notice in the same proceeding,<sup>2</sup> Centennial Communications Corp. ("Centennial") hereby submits the following report detailing its efforts on compliance with the Commission's hearing aid compatibility requirements for digital wireless handsets. In this report, Centennial includes all information of which it has knowledge, but does not address those reporting requirements in the Order that can only be answered adequately by the individual handset manufacturers from which Centennial obtains digital wireless handsets.

Centennial provides CMRS service both in and outside of the continental United States, and operates different network designs within the two regions. Centennial holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands and we operate a CDMA network in that region. Centennial also holds licenses to provide digital cellular and PCS service in 34 markets in the Midwest and Southern United States, and we utilize a GSM network in our domestic markets. The responses below are the same for both regions, unless noted.

**(1) Digital wireless phones tested:** Centennial operates both CDMA and GSM systems and obtains digital wireless telephone handsets manufactured by several

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<sup>1</sup> In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, *Report and Order*, WT Docket No. 01-309, 18 FCC Rcd 16753, released August 14, 2003.

<sup>2</sup> Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers, Public Notice, 19 FCC Rcd 4097 (WTB 2004).

handset vendors (collectively, “vendors”). Centennial carries several CDMA and GSM handsets that are compliant with the ANSI C63.19 standard (“Compliant Phones”). However, Centennial does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. It relies upon its vendors to conduct testing and to confirm the compliance of each specific digital handset device.

**(2) Laboratory used:** As indicated herein, Centennial does not conduct the laboratory testing of its digital handset devices for compliance with the ANSI C63.19 standard. It relies upon its vendors to conduct testing and to confirm the compliance of each specific digital handset device.

**(3) Test results for each phone tested:** According to its vendors, the compliant handsets deployed by Centennial have tested positively for M3, M4 or T3 compliance.

**(4) Identification of compliant phone models and ratings according to ANSI C63.19:** According to our vendors, the following models currently ordered by Centennial are rated M3 or M4 under standard ANSI C63.19-2005:

**In our Caribbean market:**

Motorola Model Nos. V265, V3C, V710 and K1 Krazer  
Nokia Model Nos. 6255I and 2865I

**In our domestic markets:**

Motorola Model Nos. V3 and V220  
Nokia Model Nos. 6061 and 6102

In addition, the LG2000 is rated T3 by our vendor

**(5) Status of product labeling:** Centennial relies upon the manufacturers to label all products prior to their shipment to our retail locations.

**(6) Outreach efforts:** Our vendors have worked to ensure that the phone packages are labeled correctly. Written materials, pamphlets and other promotional literature are provided at the point of sale, explaining the HAC features of compliant handsets. In addition, Centennial trains our sales force to be aware of which of its handsets sold are HAC-compliant.

**(7) Retail availability of compliant phones:** HAC-compliant handsets are available in all of Centennial’s retail outlets.

(8) **Incorporation of hearing aid compatibility features into newer models of digital wireless phones**: Centennial relies upon handset manufacturers to incorporate HAC features into future CDMA and GSM handsets.

9) **Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order**: Centennial is ready and willing to offer additional compliant devices to interested customers, and encourages its vendors to expedite the availability of advanced handset devices.

(10) **Number of compliant and non-compliant phone models offered at this time**: Centennial's offers a variety of handsets. As described above, in our Puerto Rican market, we offer numerous CDMA handsets, of which six are HAC compliant. In our domestic markets, we also offer numerous GSM handsets, of which five are HAC compliant

(11) **Differences in handset offerings among regions in service areas, if any**: As explained in response to Item 4 above, Centennial operates different networks and consequently offers different handsets in its domestic versus Caribbean markets.

(12) **Ongoing efforts for interoperability testing with hearing aid devices**: Centennial primarily relies upon its vendors to conduct interoperability testing of compliant handsets, and will provide to consumers information about those efforts upon request.

Sincerely,

/s/ William Roughton

William Roughton  
Vice President, Legal and Regulatory

Centennial Communications Corp.

Affairs